

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Empowering Parents and Protecting Children in an)	MB Docket No. 09-194
Evolving Media Landscape)	

**COMMENTS OF
FAMILY ONLINE SAFETY INSTITUTE**

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EXECUTIVE SUMMARY

The Family Online Safety Institute (“FOSI”) offers these comments to inform the Commission about the ongoing efforts to empower parents and help protect kids in the evolving media landscape by teaching kids to be responsible digital citizens. Children can benefit from online media while learning to understand privacy and embrace safety. The opportunities created by the Internet far outweigh the risks that children face and promoting digital citizenship will also increase broadband adoption. As technology develops at a rapid pace, so do the risks, but increased digital and media literacy will produce responsible kids who will be active 21st Century digital citizens.

The Internet industry works to empower parents and help kids make responsible online decisions through education and awareness campaigns. Videos, public service announcements, classroom training, and information resources all help kids avoid risks and learn the consequences of their online behavior. Industry continues to improve tools and create new solutions to protect kids online while also raising awareness about safety.

Digital literacy and media literacy are essential elements to building a culture of responsibility online. Teaching children how to embrace their rights and responsibilities while online will help minimize risks and maximize the benefits of the Internet, creating well-informed digital citizens. The government can help build a culture of responsibility online by funding research and education efforts, promoting digital literacy, and informing parents of risks and opportunities online. The continued work of industry, educators, and the government will empower parents to utilize existing tools, establish household media rules, and engage in an ongoing dialogue to keep their children safe when using new media.

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Comments of Family Online Safety Institute

I. Introduction

The Family Online Safety Institute (“FOSI”) is pleased to submit these comments in response to the Commission’s Notice of Inquiry (“NOI”) in the above-captioned proceeding.¹ FOSI is working towards a culture of responsibility online, where government, law enforcement, industry, parents, teachers, and the kids themselves all work together to make the online world safer. FOSI offers these comments in an effort to inform the Commission about the benefits of online media use by children and young people, current risks and how parents can help protect their kids from these risks, what industry does to protect and educate children in the evolving digital landscape, how industry continues to innovate in this field, the need for digital citizenship, and what roles the government can play to encourage digital and media literacy and online safety.

II. FOSI Works to Build a Culture of Responsibility Online and Increase Digital Citizenship

FOSI is an international, non-profit membership organization working to make the online world safer for kids and their families by identifying and promoting best practices,

¹ *In the Matter of Empowering Parents and Protecting Children in an Evolving Media Landscape*, MB Docket No. 09-194, rel. Oct. 25, 2009 (“NOI”).

tools and methods that also respect free speech.² FOSI's members represent the best of the Internet industry, including broadband providers, wireless providers, social networking websites, technology companies, and major trade associations.³ FOSI works as a trusted convener, bringing together leaders in government, industry, and the nonprofit sectors to collaborate and innovate new solutions in online safety in a Web 2.0 world.

FOSI previously filed comments with the Commission in the Matter of Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming⁴ to inform the Commission about the existing technologies and tools available to help parents and caregivers protect children from inappropriate content. FOSI highlighted the variety of filters and blocking technologies available. In addition to encouraging technologies and tools, FOSI's mission is to build a culture of responsibility online. FOSI believes it can build such a culture of responsibility if six separate but overlapping layers work together: 1) government; 2) law enforcement; 3) industry; 4) teachers; 5) parents; and 6) kids. Specifically, we can create a safe, healthy, and productive environment for kids online if we have:

- 1) Reasonable government oversight and support;
- 2) Fully resourced law enforcement;
- 3) Robust and comprehensive industry self-regulation;

² See www.fosi.org.

³ Current FOSI members include: AOL, AT&T, Blue Coat Systems, BT Retail, Comcast, Facebook, France Telecom, Google, GSM Association, Kingston Communications, Loopt, Microsoft, MySpace, NCTA, Ning, Nominum, Optenet, RuleSpace, Sprint, StreamShield, Symantec, Telefónica, TELMEX, The Wireless Foundation, Time Warner Cable, Verizon, Yahoo!.

⁴ Comments of Family Online Safety Institute, *In the Matter of Implementation of Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, MB Docket No. 09-26 (filed April 16, 2009).

- 4) Tech-savvy teachers;
- 5) Empowered parents; and
- 6) Resilient kids making wise choices about the content they access and post online, the people they contact, the people they allow to contact them, and how they conduct themselves online.

In November 2009, FOSI's Third Annual Conference, "Building a Culture of Responsibility: From Online Safety to Digital Citizenship," focused on these layers and provided two days of discussion from industry, government, and non-profit organizations about the current state of online safety and need for increased media and digital literacy education.⁵

Teaching our kids to be good digital citizens is just as critical as keeping them from potentially harmful content. By teaching children to make wise choices online and engage in the best of the Internet, families and teachers can protect children from the risks that exist online and thereby produce digital citizens equipped with skills to help them later in life. In these comments, FOSI seeks to showcase efforts to build a culture of responsibility online by empowering parents and promoting digital citizenship so that kids may benefit from this changing media landscape.

III. Children Benefit from the Evolving Media Landscape

Children's increased media use allows them to communicate with one another in new and exciting ways, gaining and sharing knowledge. Kids can create their own content and share their thoughts, feelings, ideas, and even comical videos worldwide. They can use the Internet to explore the world from their desk at school and learn

⁵ See FOSI 2009 Annual Conference, *available at* <http://www.fosi.org/cms/index.php/annual-conference-2009.html>.

valuable skills that will help them throughout their academic lives and careers. According to Professor Sonia Livingstone, the benefits of children's media use come in four major categories: education, learning and literacy; participation and civic engagement; creativity; and identity and social connection.⁶ Media use will help children learn valuable skills for future employment, gain societal connections, and even increase their civic engagement.

A. Children's Media Use Will Help Create Skilled Workers

FOSI agrees with the Commission's statement in the NOI that, "Children with digital media skills were also likely to be better positioned to compete in today's workplace."⁷ Students need to learn how to use digital media and crucially, how to use it responsibly. By incorporating digital media into the classroom experience and embracing the benefits of media use, students will be equipped to perform jobs in the modern world.

B. Children Can Benefit Socially and Emotionally from Media Use

If children are taught how to use the Internet and how to make wise choices while online, they can reap many social benefits including increased connectivity and communication to friends and family through social networking and instant messaging. Media use can even have a positive impact on self-esteem and self-identity.⁸ "In sum, social networking sites seem to do well at helping adolescents maintain and extend their

⁶ Sonia Livingstone and Leslie Haddon, *Kids Online Opportunities and Risks for Children*, The Policy Press: University of Bristol, 2009 at 8.

⁷ NOI, *supra* note 1 at ¶ 19.

⁸ Peter Iochen, Patti Valkenburg and Cedric Fluckiger, "Adolescents and social network sites: identity, friendships and privacy." *Kids Online Opportunities and Risks for Children*, The Policy Press: University of Bristol, 2009 at 86-88.

social network. There also seems to be a poor-get-richer effect: individuals with a low self-esteem make more friends than individuals with a high self-esteem.”⁹

In the UK, Professor Tanya Byron has identified the many benefits of Internet use for children and teens noting that, “Going online and playing video games are a central part of children and young people’s lives... These technologies offer a range of opportunities unheard of in previous generations - opportunities for learning, for play, for communication, for skill development, for creativity and for having fun.”¹⁰ If children are taught safe and responsible online behavior and encouraged to embrace media use, this can have a positive impact on their academic and career skills as well as their connections to friends and family and their outlook on their personality.

IV. Digital Risks Exist Online Just as Risks Exist for Kids Offline

Children face risks in the offline world and also face challenges online. Many of the risks that kids face from new technologies are created by the kids themselves. This NOI identifies the most common problems as, “Increased use of the Internet by children, including increased use of social networking sites creates new risks to minors online, including the danger of sexual solicitation, exposure to online harassment and bullying, frauds, scams, and compromised privacy.”¹¹ In early 2009, the Internet Safety Technical Task Force found that the online risks are not that different from the risks youth face in

⁹ Livingstone *supra* note 6, at 89.

¹⁰ Dr. Tanya Byron, “Safer Children in a Digital World: the report of the Byron Review,” 2008, at 19 available at <http://www.dcsf.gov.uk/byronreview/>.

¹¹ NOI, *supra* note 1 at ¶ 31.

the offline world.¹² As Anne Collier has noted, the harms that come from these online risks impact physical, psychological, and reputational and legal safety.¹³ The chief risks that come along with Internet use by kids today are the problems of cyberbullying, sexting, and self-harm websites. FOSI published detailed reports on each of these topics in late 2009,¹⁴ and provides a brief overview of each of these risks here.

A. Cyberbullying

In the past few years, cyberbullying has emerged as one of the greatest online risks for kids. This problem, more common than previous fears of online predation, involves child-on-child harassment. According to the Pew Internet & American Life Project, one third of U.S. teens using the Internet has been harassed online.¹⁵ Some children have no problem with cyberbullying and simply block out the bullies and ignore what may be said, the same way some may ignore traditional schoolyard bullies, but others suffer negative effects from this online behavior. “Consistent with previous research, youth who are harassed online report a mix of psychological problems. They are significantly more likely to be targeted by victimization offline.”¹⁶ Children can become upset because of what is said to them online and these feelings may impact their

¹² Internet Safety Technical Task Force, “Enhancing Child Safety & Online Technologies: Final Report of the Internet Safety Technical Task Force,” The Berkman Center for Internet and Society at Harvard University, Dec. 31, 2008, at 7, available at <http://cyber.law.harvard.edu/pubrelease/isttf>.

¹³ See Anne Collier, Online safety: The means not the end,” ConnectSafely.com, April 16, 2009 available at <http://www.connectsafely.org/NetFamilyNews/online-safety-the-means-not-the-end.html>.

¹⁴ See Family Online Safety Institute, FOSI Reports “Sexting in the USA;” “Self Harm in the Digital Age;” and “Cyberbullying- A Global Concern,” 2009, available at <http://www.fosi.org/cms/index.php/resources.html>.

¹⁵ Amanda Lenhart, “Cyberbullying and Online Teens,” Pew Internet & American Life Project, June 27, 2007 at 1, available at <http://www.pewinternet.org/Reports/2007/Cyberbullying.aspx>.

¹⁶ Michele Ybarra et al. “Examining the Overlap in Internet Harassment and School Bullying: Implications for School Intervention,” *Journal of Adolescent Health* 41 (2007) S49.

schoolwork and interactions with classmates. Legislators and educators need to understand the difference between teasing, mean comments and actual harassment. FOSI does not believe that criminalizing cyberbullying, as some lawmakers have proposed,¹⁷ is the right solution to prevent this online risk. Instead, education, empowerment and tools from websites can offer ways to mitigate the likelihood that children will fall prey to cyberbullying.

B. Sexting

Sexting, the act of sending sexually explicit pictures via text message or over the Internet, emerged in 2009 as one of the biggest online risks in the U.S. Many teens remain unaware of the consequences of sending these images and the fact that in many states they could face felony charges for sending or receiving the images.¹⁸ In addition to potentially serious legal consequences, including having to register as a sex offender, teens may suffer from reputational and psychological harm from sexting.

Increased Internet access from mobile phones is contributing to this risky behavior. According to Amanda Lenhart of the Pew Internet & American Life Project, “Many teens now use their phones, not just for calling, but also to access the Internet and to take and share photos and videos.”¹⁹ Parents have always been concerned about kids accessing nude content, and now their teens may be among those producing the material. According to a survey by the National Campaign to Prevent Teen and Unplanned Pregnancy and

¹⁷ Megan Meier Cyberbullying Prevention Act, H.R. 1966, 111th Congress (2009).

¹⁸ Deborah Feyerick and Sheila Steffen, “Sexting Lands Teen on Sex Offender List,” CNN.com, April 8, 2009, available at <http://www.cnn.com/2009/CRIME/04/07/sexting.busts/index.html>.

¹⁹ Amanda Lenhart, “Teens and Sexting: How and why minor teens are sending sexually suggestive nude or nearly nude images via text messaging,” Pew Internet & American Life Project, Dec. 15, 2009 at 2, available at <http://pewresearch.org/assets/pdf/teens-and-sexting.pdf>.

CosmoGirl.com, one out of five teens have sent or posted nude or semi-nude photographs or videos of themselves.²⁰ The same study found that 44% of teens said it is common for these images to get shared with someone other than the person they intended to receive the image.²¹

This risky behavior is drawing attention from the law enforcement community. Some prosecutors are using laws intended to punish people for creating and distributing child pornography as a means to charge teens found sexting. Last year, an 18-year-old Florida resident was charged with distribution of child pornography and is now a registered sex offender as a result of forwarding a naked photo of his 16-year-old girlfriend.²² Some sexting incidents have even resulted in suicide when the impact of the pictures being forwarded caused severe emotional harm.²³ A Massachusetts District Attorney recently held a press conference to tell parents and kids of the legal consequences of sexting and warned that teens who sext could face felony charges for the behavior. This District Attorney tried to raise awareness of the risks and held outreach and training sessions for parents and kids, highlighting the other consequences including possible “school suspension, humiliation and emotional distress.”²⁴ Sexting poses serious challenges for

²⁰ National Campaign to Prevent Teen and Unplanned Pregnancy and Cosmogirl.com,” Sex and Tech Results from a Survey of Teens and Young Adults,” 2008 at 1, *available at* http://www.thenationalcampaign.org/sextech/PDF/SexTech_Summary.pdf.

²¹ *Id.* at 3.

²² Deborah Feyerick and Sheila Steffen *supra* note 18.

²³ *See Id.* noting the case of Jessica Logan an Ohio teen who killed herself after her nude photographs were forwarded to other students.

²⁴ Berkshire, Mass. District Attorney’s Office, “District Attorney Holds Press Conference on Problem of ‘Sexting’ in Berkshire County,” March 3, 2009 *available at* http://www.mass.gov/?pageID=bermodulechunk&L=1&L0=Home&sid=Dber&b=terminalcontent&f=nu_2009_0303_sexting_press_conference&csid=Dber.

kids online. Teens need education about the legal and reputational consequences about this behavior to prevent more harm.

C. Self-Harm Websites

The problems of self-harm and eating disorders exist in the offline world, but in this digital landscape, young people can be exposed to websites that promote self-harm and encourage risky behavior all too easily. While the Internet brings positive connections to many, it also allows teens to come together to encourage eating disorders on websites and blogs. There are some websites that are focused on recovering from eating disorders and these sites are a positive aspect of online use, providing support for those trying to stop destructive behavior. Researchers found that 35% of eating disorder patients visited pro-Anorexia websites and 96% of those visitors learned new techniques for weight loss and purging.²⁵ CyberSentinel studied 1,500 female Internet users between the ages of six and 15 in 2009 and found that of those studied, one in three searched online for dieting tips and one in five corresponded online in chat rooms for dieting tips.²⁶ The continued growth of pro-harm websites and the content these sites provide are among the biggest risks kids face in this evolving digital media landscape.

Cyberbullying, sexting, and the promotion of self-harm are the biggest risks to kids online today. Young people face the challenge of learning to block out the bullies, keep their information private, engage in social networks without over-sharing about

²⁵ Jenny Wilson and Rebecka Peebles, "Surfing for thinness: a Pilot Study of Pro-Eating Disorder Web Site Usage in Adolescents with Eating Disorders," *Pediatrics* 118 (6) 1635-43, Dec. 6, 2006, *available at* <http://pediatrics.aapublications.org/cgi/content/full/118/6/e1635>.

²⁶ "Skinny Celebrities Drive One in Five 11 Year-Olds to Diet," *Daily Telegraph*, April 21, 2009, *available at* http://www.telegraph.co.uk/health/children_shealth/5193807/Skinny-celebrities-drive-one-in-five-11-year-olds-to-diet.html.

themselves, and seek out appropriate content. Electronic media does pose risks for children, but parents, teachers, and industry are working together to minimize these risks.

V. Protecting Children from the Risks - How Empowered Parents Can Help

Involved parents are an essential element to protect children from risks online. Parents need to learn about the risks and help their kids understand how to deal with them. Public service announcements, videos with information, and tips for parents and kids all help people learn about the potential harms and ways to stop kids from being victims of cyberbullying or engaging in sexting or harmful behavior. There is no silver bullet to protect children from the risks of digital media. A combination of education, awareness, tools, and rules will help guard children from harmful content and empower them to act responsibly online. Parents can get more involved by creating household media rules and engaging in an ongoing dialogue with their children as well as employing available tools.

A. Parents Should Create Household Media Rules

Parents should be encouraged to create household media rules. They should set limits on the amount of time kids can spend online and what kind of content they can access. Helping parents become engaged in their children's online experience will help protect their kids. If parents actively set limitations on media use, this may help improve the well being of their children. For example, a recent Kaiser Family Foundation Study found that "Children who are heavy media users are more likely to report getting fair or poor grades (mostly C's or lower) than other children."²⁷ This study determined that

²⁷Victoria J. Rideout, Ulla G. Foehr, and Donald F. Roberts, "Generation M2 Media in the Lives of 8-to 18-Year-Olds," Henry J. Kaiser Family Foundation, 2010, at 13, *available at* <http://www.kff.org/entmedia/8010.cfm>.

when parents set rules limiting media use their children spent less time with media.²⁸

According to the Kaiser Family Foundation Study, a majority of young people do not have any rules about the type of content they can access or how long they can spend playing video games, watching television, or using the computer.²⁹ If parents establish household rules limiting the types of content children access and how much time they can spend accessing media, this will present an ideal time to start a dialogue between parents and kids about what the kids are doing online and how the parents expect the kids to behave and improve the lives of children.

Protecting children from the risks of the Internet requires engaged parents. According to Professor Tanya Byron, “Any comprehensive package of reform to minimize risk to children from the internet must help parents, who are in the best position to know and understand the individual differences between the children, develop skills around e-safety.”³⁰ Parents need to learn about what their kids are doing online and what risks they face, to enable them to communicate with their children and engage in an ongoing dialogue about responsible online behavior.

B. FOSI Provides and Encourages Online Safety Contracts for Families

FOSI believes that having a household media contract can help families stay aware of the risks and responsibilities online. By creating a contract together governing elements of a child’s digital use, families can create a dialogue about expectations for online behavior. Parents can discuss reasonable limits on how long kids should stay

²⁸ *Id.* at 4.

²⁹ *Id.* at 35.

³⁰ Dr. Tanya Byron, “Safer Children in a Digital World: the report of the Byron Review,” 2008 at 137, available at <http://www.dcsf.gov.uk/byronreview/>.

online, what types of sites they can visit, and talk to their children about what to do if they find something that makes them uncomfortable or what to do if someone is bullying them online. One example of such a contract can be found on FOSI's website where FOSI provides a sample contract and encourages families to place the contract near the computer as a reminder to kids and parents about their online activities.³¹ Many other companies also provide family safety contracts to help parents and children discuss and create household media rules.³²

VI. Industry Works to Empower Parents and Protect Children

Technology and education can be used to protect kids from online risks and make parents aware of those risks. The Internet industry is working to promote education and empowerment of parents and students to teach them the potential dangers online and how to conduct themselves in a safe and responsible manner. The Internet industry works hard to prevent and stop risks such as exposure to inappropriate content, cyberbullying, self-harm, and sexting. Companies work hard to balance the interest of freedom of speech and protection of children by responding to these risks through innovative tools, public service campaigns, and awareness efforts.

A. Social Networking and Video Sites Respond to Online Risks

Social networking websites are working to give users additional tools to help them stay safe from the risks of digital media and also trying to educate users. The U.S. Internet Safety Technical Task Force found that, "All eight of the social network sites

³¹ FOSI Safety Contract, available at <http://www.fosi.org/cms/index.php/resources/257-fosi-safety-contract.html>.

³² See e.g. Microsoft, "Using Family Contracts to Help Protect Your Kids Online," available at <http://www.microsoft.com/protect/parents/childsafety/contract.aspx>; see also, Comcast Voices, "Security Scene: Family Safety Contract," April 29, 2009, available at <http://blog.comcast.com/2009/04/security-scene-safety-family-contract.html#more>.

who submitted to the Task Force provide a technology-driving mechanism by which users can report abuse to the site's operators."³³ When it comes to self-harm content, for example, many social networking websites encourage users to report problematic content such as information that promotes self-harm.

Facebook is working to prevent cyberbullying and self-harm content and states that, "Bullying is taken extremely seriously. There is really nothing that's more important to us than the safety of our users and especially the many teens who are using Facebook."³⁴ Facebook provides users with a Statement of Rights and Responsibilities to help users understand how they must behave on the site. This statement prohibits users from intimidating and harassing others and allows Facebook to disable the accounts of people who are found bullying, posting hateful content or threatening others.³⁵ In addition to the rights and responsibilities for youth and other Facebook users, the company also employs a reporting infrastructure to review dangerous content and look out for issues like cyberbullying and the promotion of self-harm and the Facebook team promptly reviews reports of risk-oriented content and removes the content if necessary.³⁶

The social networking site, MySpace, also helps prevent online risks by offering a comprehensive safety site for users which provides advice about cyberbullying and tips

³³ Internet Safety Technical Task Force, "Enhancing Child Safety & Online Technologies: Final Report of the Internet Safety Technical Task Force," The Brekman Center for Internet and Society at Harvard University, Dec. 31, 2008, at 24, *available at* <http://cyber.law.harvard.edu/pubrelease/isttf>.

³⁴ Jessica Heslam, "Safety 'Key' on Facebook, rep says," Boston Herald, Jan. 26, 2010, *available at* <http://news.bostonherald.com/news/regional/view.bg?articleid=1228265&chkEm=1>

³⁵ Facebook, "Statement of Rights and Responsibilities" *available at* www.facebook.com/terms.php.

³⁶ See www.facebook.com/safety.

for how to stop the problem.³⁷ MySpace asks that users report cyberbullying and offers tips to stop the abuse, stating, “We at MySpace have zero tolerance for hate-speech and harassment and we’ll partner with you to stop it, pronto.”³⁸ By offering report abuse options, safety tips, and phone and email reporting for parents and kids, MySpace is taking the initiative to empower users to help stop cyberbullying. MySpace also takes proactive steps to prevent self-harm material appearing on its users profiles and encourages groups to help with recovery from eating disorder problems. MySpace’s Terms of Use prohibits material promoting eating disorders and self-harm. MySpace bans and removes content that “promotes or otherwise incites...physical harm against any group or individual.”³⁹

Google also tries to combat some of the online risks to kids on social networks by using YouTube videos to raise awareness of problems like cyberbullying. Part of Google’s campaign for safety has created a cartoon video that shows the consequences and implications of posting negative comments online to make fun of others. This video was used to teach users about cyberbullying and how to behave respectfully and responsibly on YouTube.⁴⁰ YouTube also provides tips for what to do if people post negative comments on videos. It has a zero-tolerance policy for harassment, stalking,

³⁷ MySpace, “MySpace.com Safety & Security,” *available at* <http://www.myspace.com/safety>.

³⁸ MySpace, “What Can You Do to Stop Cyberbullying on MySpace,” *available at* http://faq.myspace.com/app/answers/detail/a_id/42.

³⁹ MySpace.com, “Terms of Use Agreement,” *available at* <http://www.myspace.com/index.cfm?fuseaction=misc.terms>.

⁴⁰ *See* YouTube, “Playing and Staying Safe Online,” *available at* <http://www.youtube.com/watch?v=DQ5zJvA0NYY>.

predatory behavior and online threats, and also offers a “Safety Center” with advice and suggestions for users who are facing online risks like cyberbullying.⁴¹

B. Videos and Television Programs Can Empower and Protect Kids

Another example of a non-technological solution that helps protect kids is the NetSmartz program. The NetSmartz Workshop created a campaign called “Use Your NetSmartz” to help teach kids about Internet safety.⁴² NetSmartz also uses characters and videos aimed at kids and teens to teach them safe online behavior and tries to convey safety messages through fun, easy to remember lessons including songs and games. The characters help teach kids not to bully and how to do things like protect their passwords. NetSmartz creates different videos to deal with teen-specific issues. It provides everyone access to these materials for free online and also offers areas specifically for teachers to help develop presentations on Internet safety.⁴³

Other examples of non-technical solutions are public service announcements and video campaigns to educate kids and teens about media risks. An example of one of these is Facebook’s partnership with MTV, on a project to educate teens about Digital Abuse. Part of the project sees these two companies working together to inform audiences about online risks, thereby empowering kids and parents.⁴⁴ As a part of this project, MTV is producing an series called, “A Thin Line,” to teach teens about the dangers of sexting and

⁴¹ YouTube Help, “Safety Center: Cyberbullying,” *available at* <http://www.google.com/support/youtube/bin/answer.py?hl=en&answer=126290>.

⁴² See NetSmartz, “Use Your NetSmartz,” *available at* <http://www.netsmartz.org/UYN/UYN.htm>.

⁴³ See NetSmartz Safety Presentations *available at* www.netsmartz.org/presentations/.

⁴⁴ Richard Allan, “Working Together for Online Safety,” The Facebook Blog, Dec. 7, 2009 *available at* <http://blog.facebook.com/blog.php?post=195195332130>.

cyberbullying to stop online abuse.⁴⁵ These are just a few of the ways that public service announcements and collaborative projects to create video programming can increase awareness of media risks.

C. The Internet Industry Empowers Through Education

The Internet industry is working to protect kids online and empower parents by educating them about online risks and positive online behavior. For example, Yahoo! helps eliminate online risks by providing a robust online safety site, Yahoo! Safely⁴⁶ which features up-to-date safety videos and blogs from leading experts and by hosting an annual ‘CyberCitizenship Summit’ for educators. Yahoo! works proactively with law enforcement to educate middle school students on safer practices by offering annual assemblies and creating an original diversion course for high risk youth. Additionally, Yahoo! provides report abuse links on services such as Yahoo! Messenger, Flickr and Yahoo!Profiles. According to Yahoo!, “Our report abuse feature is meant to help us address several issues, including distribution of offensive or illegal content, online harassment or cyberbullying, and misuse of email or instant messaging services.”⁴⁷ In addition to offering technical solutions for online risks, Yahoo! is an active member of FOSI and also partnered with NetSmartz.org to provide a video to educate teens about dealing with cyberbullying.⁴⁸

⁴⁵ MTV, “MTV Launches ‘A Thin Line’ to Hault Digital Abuse,” Dec. 3, 2009 *available at* <http://www.mtv.com/news/articles/1627487/20091203/story.jhtml>.

⁴⁶ See Yahoo! Safely, *available at* <http://safely.yahoo.com>.

⁴⁷ Internet Safety Technical Task Force, *supra* note 33, Appendix E at 72.

⁴⁸ *Id.* at 74.

Microsoft is also working to protect families online and help parents create a safe media environment for their children through awareness and education. Microsoft offers an Online Safety website that provides a sample family safety contract, provides age-specific guidance for kids' Internet use and offers advice for parents to help their kids deal with online risks such as misinformation, hate online, and cyberbullying. In addition to providing tips for parents, this website also offers step-by-step instructions for parents to easily set controls on a range of Microsoft products including Xbox, Zune, and Windows. This website also provides educational information on cyberethics and suggestions about how kids can protect their online reputation.⁴⁹ Microsoft also provides GetGameSmart.com, a website that helps families set rules about media use and gain the knowledge and resources to commit to a safe media experience in their home. The GetGameSmart.com Family Challenge provides families with easy steps to establish rules for household media use and even encourages families to submit tips and advice that may be featured on the website. GetGameSmart.com also provides a pact for families to print and sign to create rules for the type of content accessed and amount of time spent on all media devices. In addition to the pact, GetGameSmart also provides a pledge for parents to commit to create a safer entertainment experience at home.⁵⁰

The mobile industry is also working hard to educate parents and children about online risks, especially in an increasingly mobile environment. Many companies within the mobile industry provide resources to help kids learn responsible online behavior. One example of this is CTIA The Wireless Foundation's partnership with Connect Safely.org

⁴⁹ See Microsoft Online Safety, available at <http://www.microsoft.com/protect/familysafety/>.

⁵⁰ See Microsoft, GetGameSmart.com, available at <http://getgamesmart.com/>.

to target digital bullying and to teach kids good cell phone etiquette through the campaign, “Get Wise About Wireless.”⁵¹ This program offers printed and downloadable information specifically tailored for parents, teachers, and kids. CTIA The Wireless Foundation also provides “S-A-F-E-T-Y Tips”, a website with advice on how to keep kids as safe as possible in a mobile environment.⁵²

Sprint partners with the National Center for Missing and Exploited Children for its “4NetSafety” program, which encourages communication and a forum for creating a dialogue between parents and kids about online safety risks. “4NetSafety” has videos aimed at teens including warnings not to over-share on social networking websites, how to protect their privacy online, and cyberbullying.⁵³ Additionally, Sprint is partnering with the Boys and Girls Clubs of America to extend this program to the millions of kids served by Boys and Girls Clubs nationwide in addition to also funding additional Internet safety information for the program.

The Verizon Foundation has been distributing grants to teach children Internet safety lessons, including recent Internet Safety Education Grants to eleven non-profit organizations in Pennsylvania in December 2009.⁵⁴ For example, the Foundation just gave a \$20,000 grant to Carnegie Mellon’s Information Networking Institute and CyLab to create a cyber awareness program that will provide education workshops and materials

⁵¹ CTIA The Wireless Foundation, “Get Wise About Wireless,” *available at* <http://www.wirelessfoundation.org/GetWise/index.cfm>.

⁵² CTIA, “Wireless Online S-A-F-E-T-Y Tips,” *available at* http://www.ctia.org/consumer_info/safety/index.cfm/AID/11648.

⁵³ Sprint, 4NetSafety, *available at* <http://www.sprint.com/4netsafety/>.

⁵⁴ Scott Aronowitz, “PA Nonprofits Receive Internet Safety Education Grants from Verizon Foundation,” *TheJournal.com*, Dec. 11, 2009 *available at* <http://thejournal.com/Articles/2009/12/11/PA-Nonprofits-Receive-Internet-Safety-Education-Grants-from-Verizon-Foundation.aspx>.

to promote safe computer use for elementary school students.⁵⁵ Verizon also provides a parental control center that has tutorials on topics ranging from social networking to safe surfing and the Verizon Foundation runs Thinkfinity.org to help educate and empower parents.⁵⁶ Last year, Verizon also focused on education and awareness of online risks through a partnership with the Ad Council to produce a public service announcement, “Textual Harassment” about digital abuse, available on the web and television.⁵⁷

When students headed back to school last fall, AT&T partnered with iKeepSafe to create educational tools, called Project PRO, to help students manage their digital reputation. These educational materials helped teachers and administrators learn and instruct on the issues of privacy and reputation and promote digital citizenship. ProjectPRO helps parents, teachers, and students learn through videos and training tools. AT&T also supports iKeepSafe’s book series that teaches online safety and digital citizenship lessons including the consequences of illegal music downloading.⁵⁸

Industry continues to create new partnerships to come up with innovative ways to get age-appropriate messages across to students, parents, and teachers. Empowerment and the ability to minimize risks online comes through a better understanding of the potential

⁵⁵ Verizon Foundation, “Carnegie Mellon University Uses Verizon Foundation Grant to Teach Children About Internet Safety,” *available at* http://foundation.verizon.com/about/press/newstory_verizon_cmu.shtml.

⁵⁶ Verizon Press Release, “Verizon Online Security Resources and Guidance Provide Ways to Manage Activities on the Web,” June 2, 2009 *available at* <http://newscenter.verizon.com/press-releases/verizon/2009/verizon-online-security.html>.

⁵⁷ *See* Verizon, “Sexting: From Concern to Action,” Nov. 10, 2009, *available at* <http://parentalcontrolcenter.com/sexting-from-concern-to-action>.

⁵⁸ AT&T Press Release, “AT&T Creates New Online Safety Education Tools to Promote Digital Citizenship,” Sep. 10, 2009 *available at* www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=27169.

harms and by finding ways to have a positive online experience while enabling kids and teens to protect their reputations.

D. Companies are Working to Increase Awareness of Tools and Continue to Innovate New Solutions

Providing and encouraging the use of online safety tools is a community-wide effort and each aspect of the community can play a role in helping parents learn about and embrace the tools available to keep their kids safe online. Parents can be made aware of tools through education campaigns, website safety blogs, school initiatives, and even government outreach campaigns. Companies continue to develop new tools and awareness initiatives to help parents stay informed about how to prevent their kids from online risks. As new risks or challenges emerge, companies continue to respond with new tools and ideas to help empower parents.

There has never been a time when so many tools have been available for parents, grandparents, teachers, and care-givers to provide protection from online risks. All of the major operating systems and search engines provide family safety settings and mobile operators, social networks, and Internet Service Providers offer tools and settings to help protect families. FOSI highlighted the multitude of online safety efforts offered by industry, non-profits, and the government in *Making Wise Choices Online* in 2008, and also in comments filed with the FCC in the Matter of Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming.⁵⁹ The rapid pace of innovation in technology is also producing innovation

⁵⁹ Family Online Safety Institute, *Making Wise Choices Online- Online Safety Education Initiatives*, Nov. 2008 available at <http://www.fosi.org/cms/index.php/making-wise-choices-online-report08.html>; see also, Comments of Family Online Safety Institute, *In the Matter of Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, MB Docket No. 09-26, (filed April 16, 2009).

in tools for parents. Since *Making Wise Choices* was published, even more tools and resources have become available.

Parental uptake of these tools remains low, but the numbers are growing. This may be a reflection of a generational shift and may take the next generation of parents, born in the Internet age, to fully adopt basic safety and security measures for their children.

Parental control tools cannot replace involved and empowered parents but they do continue to be a part of the solution to keeping kids as safe as possible from potential harm. Technology develops at a rapid pace and with each new development companies try to create new and innovative tools for parents and teachers. An example of continued innovation is Google's recent implementation of a lock on its SafeSearch settings. Google has offered a SafeSearch filter for parents to keep kids from inappropriate content, but identified a need to allow parents to lock SafeSearch to make it harder for kids to change the settings so created a solution that allows parents to lock SafeSearch by the use of a password where the lock will indicate when a child has tried to change the setting.⁶⁰ In early February 2010, YouTube announced a new safety mode to help give users more control over the content they see.⁶¹ The new YouTube Safety Mode can block objectionable content, eliminate comments below videos, and even asterisk out curse words. This mode is password protected so parents can lock in the setting and their children can enjoy YouTube videos without coming across content that may be

⁶⁰ Larry Magid, "Google Lets Parents Lock in SafeSearch" CNET News, Nov. 11, 2009 *available at* http://news.cnet.com/8301-19518_3-10395112-238.html.

⁶¹ Robin Wauters, "YouTube Introduces 'Safety Mode' for that Grey Area Content, Tech Crunch, Feb. 10, 2010 *available at* <http://techcrunch.com/2010/02/10/youtube-introduces-safety-mode-for-that-grey-area-content/>.

inappropriate for their age.⁶² Companies like Google constantly find new ways to improve existing tools and create new ones to help parents too.

Verizon encourages safe and responsible Internet use through education and tools, by providing the Family Center Website with links to tools for parents, educators, and kids, providing free Internet parental control tools, and also information and educational resources. Most importantly, Verizon's Family Center Website is regularly updated as new tools and new advice become available.⁶³

AT&T is also always advancing its tools and educational efforts, offering innovative controls and new outreach efforts each year. In February of 2009, AT&T added to its parental control options by providing new mobile settings and later added additional tools to help families keep parents and kids connected with the AT&T FamilyMap, which helps customers locate family members.⁶⁴ AT&T also continues to come up with new and creative ways to educate students about digital citizenship and tackle online risks such as texting while driving.⁶⁵

Partnerships with other organizations, such as child and senior advocacy groups, and other companies, are an essential element of the movement to empower parents and kids to stay safe online. As FOSI has shown here, companies are constantly finding new and

⁶² See YouTube Blog, "Safety Mode: Giving You More Control on YouTube," Feb. 10, 2010, *available at* <http://youtube-global.blogspot.com/2010/02/safety-mode-giving-you-more-control-on.html>.

⁶³ Verizon News Release, "Verizon Online Security Resources and Guidance Provide Ways to Manage Activities on the Web" June 2, 2009 *available at* <http://newscenter.verizon.com/press-releases/verizon/2009/verizon-online-security.html>; *see also*, Verizon Responsibility Blog *available at* <http://responsibility.verizon.com/home/blog/>.

⁶⁴ See AT&T News Release, "AT&T Keeps Parents and Kids Connected with New AT&T FamilyMap Tool and Affordable New Devices," April 15, 2009, *available at* <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=26736>.

⁶⁵ See AT&T Media Kit, "SmartLimits," *available at* <http://www.att.com/gen/press-room?pid=9122>.

innovative ways to improve tools and policies and collaborate with others to improve online safety. Facebook recently created a Safety Advisory Board, of which FOSI is a member, that will help Facebook take a collaborative approach to online safety issues and which will lead to an overhaul of the information on Facebook's Help Center, to provide more current resources and content that can help parents, teachers, and kids.⁶⁶ By forming this group and working to update policies and information available for users, Facebook is continuing to take steps to create a safe environment online and adapt to risks and safety needs as they arise.

In 2009, the National Cable & Telecommunications Association ("NCTA") created a working group to explore the best practices for online safety. The PointSmart.Click Safe Task Force Recommendations for Best Practices for Child Online Safety acknowledged that there is an "ecosystem of shared responsibility" when it comes to online safety. The Task Force's members examined the technology models available to help protect kids online and offered recommendations for companies in the Internet industry to follow.⁶⁷ FOSI was a member of this task force and sees this type of work as a good example of what industry does to evaluate the current tools and education available to help parents and kids.

FOSI works closely with industry to develop and encourage the creation of new tools to help parents manage their children's online experience. FOSI and other groups must continue to identify and promote the best tools, rules, and educational messages and

⁶⁶ Richard Allan, *supra* note 44.

⁶⁷ PointSmart.Click Safe. Task Force, "The PointSmart.ClickSafe. Task Force Recommendations for Best Practices for Online Safety," July 2009 *available at* <http://www.pointsmartreport.org/>.

methods to help empower parents and make sure kids act safely and responsibly in this new digital environment.

Additional promotional and educational efforts from companies can help parents become aware of what tools are available and teach parents how to easily use the tools to keep their kids safe while online. Publicity campaigns, news reports, more public service videos and even providing resources to parents when they sign up for mobile phones or Internet service can help empower parents to use the tools available for them.

VII. Digital Citizenship Comes from Increased Digital and Media Literacy

FOSI believes that teaching digital citizenship will help kids minimize online risk and maximize their personal safety. Students must be taught both digital and media literacy to help them make the best decisions about the digital content that they seek out and view. Digital literacy refers to understanding the actual machines and technology that consumers use, such as their PC, laptop, cell phone, or gaming system, while media literacy is the understanding of *how* to use the content that flows through these machines. Children and teens must learn both how to go online and how to do so in a safe and responsible manner and they must be taught the implications and repercussions of their actions online, especially as kids are becoming the content creators.

Internet use allows children to share and collaborate online, to post videos, write blogs, explore new aspects of the world from their home computer, and take part in the greater community as digital citizens. With all of the rights, benefits and freedoms that arise from kids going online, they must also learn about the responsibilities and consequences of their actions and use. In addition to a dialogue started with their parents

at home, kids must also learn from their teachers and peers the skills needed to go online and act responsibly.

A. Digital Citizenship Must Be Incorporated in Schools

Children should be taught media literacy throughout their schooling. Lessons should be built into the curriculum in all grades and must be part of a student's regular learning process. Teaching online safety and digital literacy skills should be a daily part of the school experience integrated throughout lessons where appropriate, instead of an occasional class. At FOSI's Annual Conference in November 2009, panelists focused on "Teaching Kids How to be Responsible Digital Citizens" and noted that digital citizenship must be integrated into a school's curriculum. Some panelists discussed the fact that education lags behind technology and that there should be a focus in schools to help make students good cybercitizens.⁶⁸

Schools need to re-think their responsible use policies. Right now, classroom computers are in a state of virtual lock-down with access to much of the web denied to students and teachers. This over-reactive stance must be modified to allow students to learn and experience the many benefits of the web. Schools must find ways to integrate technology into a student's everyday experience. What is needed to improve digital literacy is a comprehensive rethink of how to infuse online safety and responsible use into all areas of the curriculum from kindergarten through to high school, and to no longer think of media or digital literacy as a separate lesson only given by the technology

⁶⁸ See Belinha De Abreu, Media Literacy Educator and Teaching Professor, Drexel University, remarks at FOSI Annual Conference, Nov. 4, 2009 available at <http://www.fosi.org/cms/images/stories/ann-conf-09/panel-sessions/responsible-digital-citizens.pdf>.

teacher. The government can encourage new teacher training and professional development to help existing educators fuse technology into their curriculum.

B. Industry Efforts Help Improve Digital Literacy

In addition to education efforts that focus on safety, the Internet industry is working to promote digital literacy so that children have the tools and skills to go online and understand the content they access. The Cable industry is making a strong effort to bring attention to the need for digital literacy education. At FOSI's Annual Conference in November 2009, Kyle McSarrow, President and CEO of NCTA called on the government to create a national digital media literacy program.⁶⁹ According to McSarrow, "Improving digital literacy is an important step toward helping all Americans become full-fledged 'digital citizens.'"⁷⁰

Comcast recently partnered with One Economy to launch the Comcast Digital Connectors Program. This initiative provides technology learning opportunities and digital literacy education to kids from diverse, low-income backgrounds through training programs over the course of the year.⁷¹ According to Comcast Executive Vice President David L. Cohen, "As America evolves into a truly digital nation, we think we have a responsibility to ensure that all citizens of all backgrounds can use broadband to achieve

⁶⁹ NCTA Press Release, "NCTA Renews Call for Creation of National Digital Media Literacy Program," Nov. 5, 2009 *available at* <http://www.ncta.com/ReleaseType/MediaRelease/NCTA-Renews-Call-for-Creation-of-National-Digital-Media-Literacy-Program.aspx>.

⁷⁰ *Id.*

⁷¹ Comcast Press Release, "One Economy Rollout National Digital Connectors Program in 22 Locations, Increasing Digital Literacy Skills, Leadership Training and Digital Community Service," July 15, 2009 *available at* <http://www.comcast.com/About/PressRelease/PressReleaseDetail.aspx?PRID=895>

their full potential.”⁷² Promoting digital literacy is essential because increased digital literacy will help increase broadband adoption.

Google is taking part in a nation-wide “Digital Literacy Tour” focused on teaching kids about online safety, digital citizenship, and even how to read websites for truth and fiction.⁷³ Google is working with iKeepSafe to provide digital literacy training sessions directly to school students. This partnership focuses on educational lessons for students, includes presentations from students on digital literacy skills, and provides lesson plans and online videos about staying safe online and also trains volunteers to help teachers and parents learn about online safety.⁷⁴

These are just a few of the many Internet industry initiatives to promote digital literacy. While industry is working hard to form partnerships to bring digital and media literacy to classrooms around the country, this still needs to be a national priority that is spearheaded by the government.

VIII. The Government Should Encourage Digital Citizenship

In order to build a culture of responsibility online, the government has a role to play to help educate parents and children about Internet safety and to promote digital and media literacy. The government can provide reasonable oversight and support, fund research in this area, and promote educational messages.

⁷² David L. Cohen, Executive Vice President, Comcast Corp., Comcast Voices, “Digital Connectors Will Build Today’s Communities and Tomorrow’s Leaders,” *available at* <http://blog.comcast.com/2009/07/digital-connectors-will-build-todays-communities-and-tomorrows-leaders.html>.

⁷³ Scott Rubin, “Digital Literacy Tour to Launch in Fairfax, Virginia”, Google Public Policy Blog, Dec. 15, 2009 *available at* <http://googlepublicpolicy.blogspot.com/2009/12/digital-literacy-tour-to-launch-in.html>.

⁷⁴ iKeepSafe, “iKeepSafe and Google Hold First Digital Media Literacy Tour Event,” Dec. 17, 2009 *available at* <http://ikeepsafe.blogspot.com/2009/12/ikeepsafe-and-google-hold-first-digital.html>.

A. Broadband Responsibility Should be Part of Broadband Deployment Plans

The government can help empower parents and educate children about safe digital media by incorporating Internet safety in the National Broadband Plan.⁷⁵ The National Broadband Plan provides an opportunity for government leadership in advancing online safety education and awareness. The plan should include a responsibility component, encompassing everything from Internet safety to media literacy to digital citizenship.

The government can improve broadband adoption and use by increasing digital and media literacy for kids and parents. The FCC and other agencies should focus efforts on improving digital literacy and promoting the benefits of the Internet through workshops, messaging, and community outreach efforts. According to a recent FCC study on broadband adoption, “22 percent of non-adopters, or 17 million adults, indicated that they do not have home broadband because they lack the digital skills (12 percent) or they are concerned about potential hazards of online life, such as exposure to inappropriate content or security of personal information (10 percent).”⁷⁶ The government must work to help people feel comfortable with new technology and learn how to have a positive online experience. The FCC can emulate the efforts already underway by industry to help make parents and seniors feel comfortable online, take control of their online experiences, and understand the benefits of broadband use. This will increase broadband adoption and help adults understand that the Internet can be a safe environment for children if the right measures are taken.

⁷⁵ See Comments of Family Online Safety Institute, *In the Matter of a National Broadband Plan for Our Future*, GN Docket No. 09-51, FCC 09-31, Rel. April 8, 2009, (filed June 8, 2009.)

⁷⁶ FCC Press Release, “93 Million Americans Disconnected From Broadband Opportunities,” Feb. 23, 2010 available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296443A1.pdf.

Additionally, the National Telecommunications and Information Administration should allocate grants through the Broadband Technology Opportunity Program⁷⁷ to support education initiatives designed to teach digital citizenship. FOSI is introducing a Broadband Responsibility Awareness Campaign (“BRAC”), an effort to unify key players in the online safety space, best practices and online safety tools with those who provide broadband to consumers. The purpose of BRAC is to join the message of online responsibility with broadband adoption efforts by informing and educating the public about responsible broadband use and raising awareness of “digital citizenship” as a necessary component to broadband adoption. Educating consumers about how to stay safe while engaging in online activities must be a fundamental component of any effort to increase broadband adoption to ensure that Internet users stay safe online.

B. Agency Efforts to Create Positive Online Experiences

There is also a need for greater coordination of government efforts in this field. Currently, numerous federal government agencies are working on some aspect of kids and the Internet.

FOSI applauds the efforts of the FCC, the FTC, and the Department of Education for the recent release of *Net Cetera: Chatting with Kids About Being Online*.⁷⁸ This booklet is a great step to educate parents and teachers about online safety and is a good example of what the government should be doing to empower parents in this changing media landscape. The booklet identifies online risks and explains the risks and

⁷⁷ See National Telecommunications and Information Administration, “Broadband Technology Opportunities Program,” available at <http://www.ntia.doc.gov/broadbandgrants/>.

⁷⁸ Federal Trade Commission, “Cybersafety Booklet for Parents and Kids Now Available,” Dec. 16, 2009, available at <http://www.ftc.gov/opa/2009/12/netcetera.shtm>.

encourages parents to talk to their kids about being online as well as offering tips for parents on everything from dealing with cyberbullying to phishing, file- sharing and privacy concerns. *Net Cetera* also provides specific advice for parents whose kids are texting and using mobile phones. The agencies involved with this publication should focus their efforts on distributing this useful resource to as many families and teachers as possible and should continue to come up with easily understandable guidance for parents to help them understand the tips and tools available.

Currently under the U.S. Department of Commerce’s National Telecommunications and Information Administration, the Online Safety and Technology Working Group (OSTWG), comprised of industry representatives and members from federal agencies, is also analyzing industry efforts for online safety and will report to Congress later this year with recommendations on how to improve online safety.⁷⁹ Hemanshu Nigam, Chief Security Officer of MySpace and a FOSI Board Member is a co-chair of OSTWG and a number of other FOSI Members serve on OSTWG.

Another agency working on child safety issues in this evolving landscape is the FTC, which effectively informs consumers, especially parents about online safety through OnGuardOnline.gov⁸⁰ and provides fact sheets on topics, such as “Social Networking Sites: A Parent’s Guide,” to make parents aware of what their children may be doing online and encourage conversations between parents and children about safety

⁷⁹National Telecommunications and Information Administration, “Commerce’s NTIA Announces Working Group to Advise on Industry Efforts to Promote a Safe Online Environment for Children,” April 28, 2009, available at http://www.ntia.doc.gov/press/2009/ostwg_090428.html.

⁸⁰ See Federal Trade Commission, <http://www.onguardonline.gov/>.

online.⁸¹ The FTC spearheaded *NetCetera*, which is an example of reasonable government efforts that help empower parents and keep kids safe online through education and outreach. The FTC also helps protect kids through its enforcement of the Children's Online Privacy Protection Act ("COPPA")⁸² and the FTC is also working to protect kids online through recent studies and a report on content in virtual worlds that are accessed by children and teens.⁸³ The FTC empowers parents and aides online safety by enforcing COPPA and continuing to study and report on online issues that impact kids and offering guidance for both parents and industry on how to help protect kids online.

At the U.S. Department of State, there is a focus on "21st Century Statecraft" which utilizes the benefits of the Internet and digital media for foreign policy. Secretary of State, Hillary Clinton, recently discussed the 'disconnect' between families and young people when it comes to technology and what young people are doing online. She said that the government can play a role, "So we have our own work to do, not just through our government but through our families, through our education systems, and every other institution to make sure we understand the power of this technology and to engage with young people through it and about it."⁸⁴ The government needs to make a coordinated effort to integrate digital and media literacy into the education system.

⁸¹ See Federal Trade Commission, "Social Networking Sites: A Parent's Guide," *available at* www.ftc.gov/bcp/edu/pubs/consumer/tech/tec13.shtm.

⁸² Federal Trade Commission, "Drafting a COPPA-Complaint Privacy Policy," *available at* www.ftc.gov/coppa.

⁸³ Federal Trade Commission, "FTC Report Finds Sexually and Violently Explicit Content in Online Virtual Worlds Accessed by Minors," Dec. 12, 2009, *available at* www.ftc.gov/opa/2009/12/virtualworlds.shtm.

⁸⁴ Remarks of Sec. of State Hillary Clinton on Internet Freedom, January 21, 2010, *available at* <http://www.state.gov/secretary/rm/2010/01/135519.htm>.

The government can play a role in ensuring that children, educators, and parents receive appropriate media literacy training by including online safety education as an essential component of the National Educational Technology Plan. The U.S. Department of Education and others from across the government and private sector are working to create “a transformed American education system”⁸⁵ and this should include providing teachers with the training and resources to teach students to be good digital citizens and the government should encourage the use of new technology in the classroom and embrace new media and social networking for positive learning experiences instead of restricting technology. The education system is an ideal place to focus on digital literacy and the skills necessary for students to thrive in the modern world. Beginning in 2002, the Partnership for 21st Century Skills (“P21”) worked to integrate critical thinking and problem solving, communication, collaboration and creativity and innovation into the education system. P21 works to reduce the gap between what students must learn in school and the skills they need for typical 21st century communities and workplaces. This initiative places an emphasis on media literacy, civic literacy, critical thinking, interpersonal skills and global awareness.⁸⁶ P21’s emphasis on the skills necessary for success as a citizen and a worker in the 21st Century should be emulated in the education system and efforts to encourage digital citizenship.⁸⁷

A. States Work to Raise Awareness

⁸⁵ U.S. Department of Education, National Education Technology Plan, https://edtechfuture.org/?page_id=727.

⁸⁶ See The Partnership for 21st Century Skills, available at <http://www.21stcenturyskills.org/index.php>.

⁸⁷ See Stephen Balkam, “21st Century Citizenship,” HuffingtonPost, Feb. 8, 2010, available at http://www.huffingtonpost.com/stephen-balkam/21st-century-citizenship_b_453316.html.

State governments are also actively engaged in empowering parents and focusing efforts on protecting kids online. For example, Illinois Attorney General, Lisa Madigan, recently hosted the state's first Cyber Safety Summit in November 2009.⁸⁸ Attorney General Madigan also provides information on her website to help educate parents about what kids are doing with new media and she launched Project Surf Safe to help parents learn about online dangers and solutions.⁸⁹ Attorney General Madigan's efforts to convene parents, educators, and industry through a summit in Illinois, alongside the information provided on the website, are examples of what can be replicated in every state to help empower parents.

Arizona is also doing a lot of work to help families avoid online risks. Arizona Attorney General, Terry Goddard, partnered with Cox and the National Center for Missing and Exploited Children to produce a 30 minute video program on Internet safety tips and tools.⁹⁰ In addition to the video programming, the Arizona Attorney General and staff visited 150 schools to give presentations to teachers, students, and parents about staying safe online.⁹¹

Arkansas is another example where ongoing work at the state level is helping parents and kids. The "Keys to Safety" program through the Office of the Arkansas

⁸⁸ Illinois Attorney General Press Release, "Survey Shows Cyber Activity Starting at Younger Ages; Increasingly Includes Risky Behavior," Nov. 18, 2009 *available at* http://www.illinoisattorneygeneral.gov/pressroom/2009_11/20091118.html.

⁸⁹ *See* Illinois Attorney General, Internet Safety, <http://www.illinoisattorneygeneral.gov/children/internet.html>

⁹⁰ *See* Arizona Attorney General, Internet Safety, *available at* http://www.azag.gov/children_family/netsafety.html.

⁹¹ Arizona Attorney General, Internet Safety School Tour, *available at* http://www.azag.gov/children_family/InternetSafetyTour/index.html.

Attorney General, Dustin McDaniel, provides a curriculum for students and teachers to learn about online safety. State governments should continue to work to educate parents and students, promoting online safety by bringing attention to risks to increase responsible behavior through website resources, conferences, and outreach to schools.

B. Additional Funding is Needed to Enhance Safety Efforts

The government can help empower parents and kids through funding. Congress should work to fund online safety and digital literacy programs. Legislation should focus on encouraging educational solutions to the risks kids are facing online. Last year, Rep. Debbie Wasserman Schultz introduced the “Adolescent Web Awareness Requires Education Act” in the U.S. House of Representatives. This bill would have reduced cyberbullying through research into online safety as well as provide grants for education programs to help prevent risky online behavior. At the same time, Sen. Robert Menendez introduced the School and Family Education About the Internet Act which identified the issue of cyberbullying and tried to address online safety risks through resources for research and grants for Internet safety education.⁹² Right now, one of the best things the government can do to empower parents and kids and help reduce online risks is to fund research and education for Internet safety.

The government should continue to educate the public about online risks and opportunities. Through this NOI, the Online Safety and Technology Working Group and many other efforts, the government is in a position to learn about the resources, tips, and tools currently available and can work to encourage parents and teachers to utilize these resources and start a dialogue about digital citizenship with their families and students.

⁹² School and Family Education About the Internet Act of 2009, S. 1047. 111th Congress (2009) *available at* <http://thomas.loc.gov/cgi-bin/query/z?c111:S.1047:>.

IX. Conclusion

Government, parents, educators, and industry must all work together to ensure that children are responsible digital citizens. The government can encourage and fund educational efforts, teachers can embrace technology in the classroom and students can be taught to make wise choices online. Schools can play an important role in empowering both parents and kids by bringing online safety into teaching methods and school curricula. Parents can learn about what their kids are doing online, use the tools that are available to restrict usage, and develop household media rules to help limit the time and activities of their kids online. Industry should continue to innovate and bring new tools to parents and families to keep kids safe online while also continuing efforts to educate and empower parents. There is no single solution to empower parents and protect kids online, but industry, the government, schools, and parents can work together to help kids become responsible and engaged 21st Century digital citizens.

Respectfully submitted,

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